

OW
Soscia.

DEPARTMENT OF THE ARMY
NORTHWESTERN DIVISION, CORPS OF ENGINEERS
P.O. BOX 2870
PORTLAND, OREGON 97208-2870

Reply to
Attention of:

MAY 23 2001

Planning and Policy Division

Mr. Charles E. Findley
Acting Regional Administrator
Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

OPTIONAL FORM 99 (7-90) <i>Excludes enclosure</i>	
FAX TRANSMITTAL	
# of pages 5	
To <i>COO - Soscia</i>	From <i>Connie Pete RA-140</i>
Dept./Agency	Phone # <i>206 553-5811</i>
Fax #	Fax # <i>206 553-1809</i>
NSN 7540-01-317-7388	5089-101 GENERAL SERVICES ADMINISTRATION

Dear Mr. Findley:

In your letter of May 10, 2001, the Environmental Protection Agency (EPA) summarized the expectations for Corps actions on specific efforts to address water quality in the Columbia River Basin. I would like to address each of these below.

Columbia Mainstem Total Maximum Daily Load (TMDL)

My staff has been working with EPA to gain a better understanding of the TMDL process over the last few months. We have met with the states' environmental directors of the four Northwest states to further discuss future water quality efforts in the basin. The Corps appreciates EPA's attendance at these meetings. Your letter identifies four actions that you would like the Corps to consider relative to TMDLs. These actions were discussed at our meeting on May 9, 2001, and are further addressed in our Record of Consultation and Statement of Decision dated May 15, 2001. Each of these actions is discussed below:

- As agreed at several staff meetings, the Corps has and will continue to provide technical information (both historical data and modeling analysis) that could be utilized in the TMDL process for the Columbia River. For instance, the Corps has recently released the draft final report on Phase II of the Dissolved Gas Abatement Study (DGAS) for regional review, and our staffs have agreed to meet with staff from the states to review the information and how it may be utilized in the total dissolved gas (TDG) TMDL. The current position of the Oregon Department of Environmental Quality staff is that Table 5-1 of the DGAS draft final report become the basis for the TDG TMDL for the lower Columbia River. The table was developed by the Corps to identify target design discharges for use in developing structural alternatives for modifying existing projects to come closer to meeting the water quality standards of 110 percent as measured at the tailrace Fixed Monitoring Stations. I believe there is agreement that a comprehensive, basin-wide approach to water quality is necessary due to the nature of assessing upstream actions on downstream reaches. We are aware EPA and the states have court imposed milestones for development of TDG and temperature TMDLs for the mainstem Columbia

-2-

and Snake rivers and that the lower Columbia segment is one of the first. In that regard, we note that completing TMDLs for the lower Columbia segment ahead of other upstream reaches does present difficulties in both the analysis and allocation process.

- EPA wants the Corps to request and allocate sufficient funds to support TMDL development. While we are unable to provide direct funding to the states for TMDL development, the Corps views the development and implementation of a basin-wide Water Quality Plan as described in Appendix B of the National Marine Fisheries Service (NMFS) Biological Opinion (BiOp) as an avenue to provide information and support. In addition, the Corps is undertaking actions in accordance with the NMFS BiOp which have water quality benefits. We have initiated drafting a project management plan for the Water Quality Plan that identifies tasks, timing and schedule, which has been shared with EPA as well as the other Federal agencies. This will form the basis for a detailed study cost estimate for the next several years for the Water Quality Plan. For those measures in the NMFS BiOp, we intend to use the Implementation Plan process to identify needs and priorities. We have identified a capability to initiate some of the water quality work in FY 02, and we will submit a budget request for FY 03.
- EPA requests that the Corps commit to development of a specific list and time schedule to reduce water temperatures in the mainstem Columbia and Snake rivers by December 31, 2001. The Corps intent, through the development of a basin-wide water quality plan, is to work with other agencies to complete this task. We note that EPA's work plan for the temperature TMDL calls for completion of water quality modeling, problem assessment, numerical targets and loading capacities and allocations by December 2001, with draft and final TMDLs to be developed in 2002. While we may accomplish some preliminary review of potential actions prior to December 31, 2001, it is not feasible for the Corps to complete a list of temperature measures with engineering analysis supporting the time and construction cost estimates given current funding levels until a later date.
- Finally, the Corps has prepared cost estimates for alternative measures for reducing TDG at the mainstem Columbia and Snake river projects as part of the Phase II Dissolved Gas Abatement Study and for flow deflectors at Chief Joseph. And as indicated above, the Corps is willing to provide such engineering support through the water quality plan. We believe our commitments to work with the Bureau of Reclamation (Reclamation) and Bonneville Power Administration (BPA) to implement Appendix B of the NMFS BiOp will produce additional detailed cost estimates of alternative water quality initiatives for TDG and water temperature.

-3-

Engaging Other Snake River Managers

We appreciate EPA's commitment to convene a forum to identify possible watershed approaches to improve mainstem water temperatures. We will endeavor to attend and participate in such forums and provide appropriate information about our projects in that process.

Augmented Temperature Monitoring

The Corps has and is committed to continue to collect water quality data at its projects in conjunction with other agencies' monitoring in the basin. Additionally, in response to the NMFS BiOp, the Corps intends to work with the Reclamation and BPA to review the existing fixed monitoring sites as well as develop a plan for collection of temperature data and modeling of alternative Snake River operations. As discussed at the meeting on May 9, 2001, we have the capability to initiate some of that work in FY 02.

Record of Consultation and Statement of Decision

Regarding our Record of Consultation and Statement of Decision (ROCASOD), I appreciate your staff's input on the water quality sections of the ROCASOD. Attached is a copy of the signed ROCASOD. I concur with your view that the Corps' commitments to implement a basin-wide water quality plan and participation in the development of TMDLs will lead to the development of measures for implementing a water quality improvement strategy for the Columbia River. As a sister federal agency, you are aware that appropriations for funding requests will vary from year to year and we will work with your staff to identify priority actions in those cases.

In summary, I share your observation that our agencies have developed a strong working relationship. I am also aware of the difficulties that lie ahead in developing TMDLs and making improvements to water quality in the basin. However, I am committed to working with EPA, the states, and tribes in pursuing all means to accomplish this important work.

Sincerely,



Carl A. Strock
Brigadier General, U.S. Army
Division Engineer

Enclosure

-4-

Copies Furnished: w/o enclosure

Mr. Steve Wright
Acting Administrator
Bonneville Power Administration
PO Box 3621
Portland, OR 97208-3621

Mr. Ken Pedde
Acting Regional Director
US Bureau of Reclamation
Pacific Northwest Regional Office
1150 N Curtis road
Boise, ID 83706-1234

Ms. Donna Darm
Acting Regional Director
National marine Fisheries Service
Bin C15700, Building 1
7600 Sand Point Way NE
Seattle WA 98115-0070

Ms. Anne Badgley
Regional Director
U.S. Fish and Wildlife Service
911 NE Eleventh Avenue
Portland, OR 97232-4181

Ms. Stephanie Hallock, Director
State of Oregon
Department of Environmental Quality
811 SW Sixth Avenue
Portland, Oregon 97204

Mr. Tom Fitzsimmons, Director
State of Washington
Depart of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

-5-

Copies Furnished: w/o enclosure (Con't)

Mr. Steve Allred, Director
State of Idaho
Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

Ms. Jan P. Sensibaugh, Director
State of Montana
Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901